

ORRICK, HERRINGTON & SUTCLIFFE LLP
KAREN G. JOHNSON-MCKEYAN (SBN 121570)
kjohnson-mckewan@orrick.com
ANNETTE L. HURST (SBN 148738)
ahurst@orrick.com
GABRIEL M. RAMSEY (SBN 209218)
gramsey@orrick.com
405 Howard Street, San Francisco, CA 94105
Tel: 1.415.773.5700 / Fax: 1.415.773.5759
PETER A. BICKS (*pro hac vice*)
pbicks@orrick.com
LISA T. SIMPSON (*pro hac vice*)
lsimpson@orrick.com
51 West 52nd Street, New York, NY 10019
Tel: 1.212.506.5000 / Fax: 1.212.506.5151

BOIES, SCHILLER & FLEXNER LLP
DAVID BOIES (*pro hac vice*)
dboies@bsfllp.com
333 Main Street, Armonk, NY 10504
Tel: 1.914.749.8200 / Fax: 1.914.749.8300
STEVEN C. HOLTZMAN (SBN 144177)
sholtzman@bsfllp.com
1999 Harrison St., Ste. 900, Oakland, CA 94612
Tel: 1.510.874.1000 / Fax: 1.510.874.1460

ORACLE CORPORATION
DORIAN DALEY (SBN 129049)
dorian.daley@oracle.com
DEBORAH K. MILLER (SBN 95527)
deborah.miller@oracle.com
MATTHEW M. SARBORARIA (SBN 211600)
matthew.sarboraria@oracle.com
RUCHIKA AGRAWAL (SBN 246058)
ruchika.agrawal@oracle.com
500 Oracle Parkway,
Redwood City, CA 94065
Tel: 650.506.5200 / Fax: 650.506.7117

Attorneys for Plaintiff
ORACLE AMERICA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.,
Plaintiff,
v.
GOOGLE INC.,
Defendant.

Case No. CV 10-03561 WHA
**ORACLE'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**
Dept.: Courtroom 8, 19th Floor
Judge: Honorable William Alsup

Pursuant to Civil Local Rules 7-11 and 79-5, plaintiff Oracle America, Inc. ("Oracle") hereby moves to file under seal the following:

- Portions of Oracle's Response and Objection to ECF 2036;
- Portions of Exhibit 1 to the Declaration of Annette L. Hurst Per ECF 2036; and
- Exhibit 2 to the Declaration of Annette L. Hurst Per ECF 2036.

The Order Approving Stipulated Protective Order Subject to Stated Conditions entered in this case, ECF No. 68, states that when material has been designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY," a party may not file it in the public record, but must seek to file it under seal pursuant to Civil Local Rule 79-5. Stipulated Protective Order § 14.4, ECF No. 66.

Google has designated documents summarized, quoted, or reproduced in the documents Oracle is seeking to seal as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY" pursuant to the Protective Order. Therefore, pursuant to the Protective Order, Oracle moves to seal those portions of Oracle's Response and Objections to ECF 2036 and the exhibits to the Declaration of Annette L. Hurst Per ECF 2036 that summarize, quote from, or reproduce those documents.

Oracle states no position as to whether disclosure of these materials would cause harm to Google or any third parties.

Dated: August 25, 2016

KAREN G. JOHNSON-MCKEWAN
ANNETTE L. HURST
GABRIEL M. RAMSEY
PETER A. BICKS
LISA T. SIMPSON
Orrick, Herrington & Sutcliffe LLP

By: /s/ Matthew Bush
Matthew Bush

Attorneys for Plaintiff
ORACLE AMERICA, INC.